

Complaint

MARSHALL v. CREDITORS BUREU ASSOCCIATES ,

EQUIFAX

State of Georgia

County of Bleckley

KAREEM MARSHALL, being duly sworn, deposes and states as follows under penalty of perjury:

- 1) My name is KAREEM MARSHALL, and my current residence address is 486 GA-87 South, Lot 16, Cochran, Georgia, 31014.
- 2) The purpose of this Complaint is to Request Remediation.
- 3) The following company, "Creditors Bureau Associates ," is located at **112 Ward St, Macon, GA 31204**, combined in a monopolizing way with "Equifax," located at 1550 PEACHTREE Street, N.W., ATLANTA, GA, 30309-2402, to form a combination that would sustain control within the debt collection and credit reporting industries, using oppression,

fraudulent activities, wanton behavior, and malicious acts. The companies have persistently administered cruel and unjust treatment for a lengthy duration. Due to their wanton conduct, I have sustained several pecuniary and non-pecuniary damages. With their implementation of fraudulent activities, I have maliciously been tortured for a fraction of my life. The discriminatory acts and communications have defamed my character and reputation. As a blind dependent of a veteran, I may never fully heal from the trauma sustained by the several causes of action listed below. Also mentioned below are my rights and request for remedy:

DAMAGES & REMEDY

- 4) I have the right to remedy all damages sustained from their willful acts of hate based on the following.
 - TITLE 18 U.S.C. 1964 (c) Remedy for RICO
 - TITLE 42 U.S.C. 1983 CIVIL ACTION FOR DEPRIVATION OF RIGHTS
 - TITLE 15 U.S.C. 1692K CIVIL LIABILITIES FDCA
 - TITLE 15 U.S.C. 1681N CIVIL LIABILITIES FCRA
 - TITLE 15 U.S.C. 1681O CIVIL LIABILITIES FCRA
 - TITLE 18 U.S.C. 241 CONSPIRACY OF RIGHTS

- TITLE 18 U.S.C. 242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW
- TITLE 42 U.S.C. 1981 A, B, AND C
- TITLE 18 U.S.C. 1028
- TITLE 18 U.S.C. 1028A

5) As for my REQUEST FOR REMEDIATION:

6) These statements of facts are intended to convey my unwavering stance on the matter and assertively demand that these companies take full responsibility for their actions and make things right.

- I demand that these violations be rectified immediately and that I receive compensation for the damages incurred due to these violations. Please take prompt action on this matter.
- The damages incurred are listed as the following: Adverse action for loan applications amounting to \$9500 for the violating act. Therefore, these damages are per violation; The current and future need for mental health treatment is two counseling sessions per week for the duration of 52 weeks. The high levels of fear, depression, anxiety, anger, fatigue, insomnia, chronic changes in appetite, difficulty making decisions and concentrating, and social withdrawal were sustained as a result of violations committed by Experian, Equifax , and Creditors Bureau Associates .

- I also sustained persistent physical aches and pains due to Equifax , and Creditors Bureau Associates violations. The courts have acknowledged that emotional distress can result in physical symptoms and be eligible for compensation in certain cases. In Folien v. Elliott and Nakamura v. Fujii, plaintiffs could sue for damages stemming from emotional distress that caused physical symptoms. The court ruled that it constituted an injury for which damages were recoverable.

A. I am requesting \$8,059,080 (or 7,050,080 and the property at your current principle address) in damages from Creditors Bureau Associates , including \$7,059,080 in pecuniary damages and \$1,000,000 (or the deed to the property at your current principle address) in non-pecuniary damages. I assert that Creditors Bureau Associates is responsible for the damages caused by the many acts of violations mentioned within this communication. I am seeking relief for those damages.

B. I am asking for \$8,059,080 in damages from Equifax , including \$7,059,080 in pecuniary damages and \$1,000,000 in non-pecuniary damages. I claim that Equifax is responsible for the damages

caused by its many violations mentioned within this complaint. I am seeking relief for those damages.

C. It is required that the requested remediation must be made within 14 calendar days from the date of service, at the latest, in order for me (the plaintiff) to voluntarily dismiss the case.

E. I propose a punitive relief of \$1 billion to be paid jointly.

F. If it becomes necessary to go to trial to resolve this matter, I request a jury trial within a U.S. District Court.

The total amount of actual damages per violation is \$29,660. This sum is composed of three distinct components. The first component is future mental health expenses, which total \$10,160. This amount is equivalent to the cost of two sessions per week for an entire year with a mental health counselor. The second component is future medical expenses, which total \$10,000. This amount will support all physical ailments resulting from the damages caused. Finally, the third component is adverse actions, which total \$9,500. These adverse actions were a direct result of the acts of the companies. They led to multiple unsuccessful attempts to obtain funding for family care, business needs, and medical treatments.

CLAIMS

Fair Debt Collection Practice Act

- 7) I am writing to notify you that my rights under the Fair Debt Collection Practices Act (FDCPA) Section 809, Title 15 U.S.C. 1692G (b), Validation of Debt, have been violated by Creditors Bureau Associates , and Equifax . These companies have unlawfully used my personal identification information by making fraudulent reports to consumer reporting agencies without providing proof of validation. This is a violation of my rights under the FDCPA.
- 8) Exhibit C provides evidence of these ongoing violations. Creditors Bureau Associates has committed 13 counts of the violation, which resulted in damages amounting to \$385,580. The violations occurred on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23.
- 9) Equifax has also committed violations, with a total of 13 counts of the violation, which resulted in damages amounting to \$385,580, occurring on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23.

10) As of 05/01/2022, Creditors Bureau Associates and Equifax violated my rights under the FDCPA SECT. 807, Title 15 U.S.C. 1692E (2)(A) by falsely and misleadingly representing debt and using my personal identification information to create fraudulent reports for consumer reporting agencies. I have evidential proof of this in Exhibit C.

Creditors Bureau Associates committed 13 counts of the violation, resulting in \$385,580 in damages. These violations were committed on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. I have evidential proof of all these violations in Exhibit C.

Equifax committed 13 counts of violations, resulting in \$385,580 in damages. These violations were committed on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. I have evidential proof of all these violations in Exhibit C.

11) I assert that Creditors Bureau Associates and Equifax have violated my rights under FDCPA SECT. 807; Title 15 U.S.C. 1692E (5), through their false or misleading representation, as evidenced by "Exhibit C," which details their ongoing attempts to collect an unlawful debt without providing the necessary documentation (Proof of Validation). As a result of

their actions detailed in Exhibit C, they have threatened to cause and have caused economic and emotional damage to me.

Creditors Bureau Associates has committed 13 counts of these violations, resulting in damages of \$385,580, on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23 detailed in Exhibit C.

Equifax has committed 13 counts of these violations, resulting in damages of \$385,580, on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23 detailed in Exhibit C.

I have suffered economic and emotional damages.

12) I assert ; Creditors Bureau Associates and Equifax have violated my rights under FDCPA SECT. 807 Title 15 U.S.C. 1692E (7) False or Misleading Representation. This assertion is based on the evidential proof provided in Exhibit C, which shows that these companies reported insulting and disgraceful imagery of me to other corporations, organizations, governments, and individuals through consumer reporting agencies.

13) Creditors Bureau Associates committed 13 counts of this violation, resulting in damages of \$385,580. As evidenced by Exhibit C, these violations were committed on the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23.

- 14) Equifax committed 13 counts of this violation, resulting in damages of \$385,580, as evidenced by Exhibit C. These violations were committed on the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23.
- 15) As a firm statement of fact, I assert that the above companies have violated my rights under The Fair Debt Collection Practice Act FDCPA SECT. 807; Title 15 U.S.C. 1692E (7) False or Misleading Representation by reporting insulting and disgraceful imagery of me to other entities. The evidence in Exhibit C shows the violations incurred, which amount to a total of \$771,160.
- 16) It is a fact that Creditors Bureau Associates , and Equifax violated my rights under the Fair Debt Collection Practices Act (FDCPA) Section 807; Title 15 U.S.C. 1692E (8) False or Misleading Representation by communicating fraudulent credit information to a consumer reporting agency that they knew or should have known to be false. This is evidenced by Exhibit C.
- 17) The lack of validation of the alleged debt serves as substantial evidence proving that before the reporting to the consumer reporting agencies, the credit information reported should have been known to be false.
- 18) Creditors Bureau Associates committed 13 counts of this violation, resulting in \$385,580 in damages. These counts were committed on

05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23,
as evidenced by Exhibit C.

- 19) Equifax committed 13 counts of this violation, resulting in \$385,580 in damages. These counts were committed on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23; as evidenced by Exhibit C.
- 20) I assert that Creditors Bureau Associates , and Equifax have violated my rights under the Fair Debt Collection Practices Act (FDCPA) Section 807 and Title 15 U.S.C. 1692E (10) False or Misleading Representation. This is evident from Exhibit C, which demonstrates that these entities have reported false and torturous information to consumer reporting agencies without providing valid evidence to prove the accuracy of the information.
- 21) Creditors Bureau Associates has committed 13 counts of this violation, resulting in damages amounting to \$385,580. These counts are based on evidential proof as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23, as demonstrated in Exhibit C.
- 22) Similarly, Equifax has committed 13 counts of this violation, resulting in damages amounting to \$385,580. These counts are based on evidential proof as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23, as demonstrated in Exhibit C.
- 23) I assert with confidence that Creditors Bureau Associates , and Equifax have violated my rights under the FDCPA Section 807 and Title 15 U.S.C.

1692E (10) False or Misleading Representation. The evidential proof in Exhibit C demonstrates the false and torturous information reported to the consumer reporting agencies without providing valid evidence to prove the accuracy of the information. This has resulted in significant damages amounting to \$771,160, and I firmly assert my right to seek redress for the harm caused.

24) It is a fact that Creditors Bureau Associates , and Equifax have violated my rights under the FDCPA SECT. 808 and Title 15 U.S.C. 1692F Unfair Practices. The evidence presented in Exhibit C shows that they have reported damaging information to a consumer reporting agency in an adverse manner while attempting to collect an unlawful debt that is not authorized by a valid agreement.

25) Creditors Bureau Associates is responsible for 13 counts of these violations, resulting in damages of \$385,580, as evidenced by Exhibit C. These violations occurred on the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23, as evidenced by Exhibit C.

26) Equifax is responsible for 13 counts of these violations, resulting in damages of \$385,580. As evidenced by Exhibit C, these violations occurred

on the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23, as evidenced by Exhibit C.

27) Based on the evidence presented in Exhibits C, it is a fact that Creditors Bureau Associates , and Equifax have violated my rights under the FDCPA SECT. 812; Title 15 U.S.C. 1692J Furnishing Certain Deceptive Forms. They had engaged in a lengthy history of using deceptive forms to create a false belief that I participated in the collection of an unlawful debt when I was actually not involved in the collection of the debt. This evidence is further supported by the lack of validation of the fraudulent debt.

28) Creditors Bureau Associates has committed 13 counts of a violation resulting in \$385,580 in damages, as evidenced in Exhibit C as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23. Equifax has committed 13 counts of a violation resulting in \$385,580 in damages, as evidenced in Exhibit C as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23.

29) These violations by Creditors Bureau Associates , and Equifax have caused me significant harm and have resulted in substantial financial damages.

Fair Credit Reporting Act

30) My rights under the FCRA Title 15 U.S.C. 1681B (A) Permissible Purpose of Consumer Report was violated by Creditors Bureau Associates , and Equifax . They unlawfully reported my consumer report to other consumer reporting agencies without a permissible purpose, as shown in Exhibit C. Creditors Bureau Associates committed 13 violations on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23 resulting in \$385,580 in damages. Equifax committed 13 violations on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and 01/01/23 resulting in \$385,580 in damages. I have evidential proof, Exhibit C, to support all these violations.

31) I assert that Creditors Bureau Associates , and Equifax have blatantly violated my rights under the FCRA Title 15 U.S.C. 1681B (F) Permissible Purpose of Consumer Report. They have knowingly engaged in racketeering activities and unlawfully reported fraudulent consumer reports to consumer reporting agencies, as evidenced by Exhibit C.

- 32) Creditors Bureau Associates is unequivocally responsible for 13 violations, with damages totaling \$385,580, as of the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23.
- 33) Equifax is unequivocally responsible for 13 violations, with damages totaling \$385,580, as of the following dates: 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23.
- 34) I demand that these companies take immediate and comprehensive steps to rectify the damage caused by their egregious and unlawful actions. They must provide prompt and just compensation for the damages incurred as a result of their actions.
- 35) Certainly, based on factual evidence, it can be concluded that Creditors Bureau Associates and Equifax have committed violations under the FCRA, Title 15 U.S.C. 1681Q Obtaining Information Under False Pretense. The evidence provided in Exhibit C demonstrates that the aforementioned entities knowingly obtained fraudulent information under false pretenses, resulting in damages.
- 36) Creditors Bureau Associates committed 13 counts of violations, resulting in \$385,580 in damages, on the following dates 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. Equifax committed 13 counts of the violation, resulting in \$385,580 in damages, on the following

dates 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22,12/01/22,and
01/01/23.

37) Therefore, it can be stated that Creditors Bureau Associates and Equifax have violated my rights under the FCRA by knowingly obtaining fraudulent information under false pretenses, which has resulted in significant financial damages.

The Rico Act

38) Assertively and clearly, I must state that I am a victim of identity theft, which has caused me significant financial loss and emotional distress. The companies responsible for these fraudulent acts; Creditors Bureau Associates , and Equifax , have violated federal and state laws, including Title 18 U.S.C. 1001a,2 - Fraud Statements or Entries Generally; Title 18 U.S.C. 1001A,3 - Fraud Statements or Entries Generally; Title 18 U.S.C. 1028A - Aggravated Identity Theft; Title 18 U.S.C. 1028(A)(7) - Fraud Relating to Identity Theft; and Title 18 U.S.C. 1951 - Interfering with Commerce by Threats or Violence.

39) Their criminal behavior is clearly evident in Exhibit C, which exposes the racketeering activities they used to exploit and torment me. I demand justice for their actions, and I hope that the responsible parties are held accountable for their crimes.

40) I assert that Equifax committed 143 counts per violation specifically, 13 counts on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. Creditors Bureau Associates committed 88 counts per violation, respectively, 22 counts on 05/01/2022, 13 counts on 06/01/22, 13 counts on 08/01/22, 13 counts on 10/01/22, 13 counts on 11/01/22, 13 counts on 12/01/22, and 13 counts on 01/01/23. Experian committed 13 counts per violation on 05/01/2022. Such conspicuousness of fraudulent activities indicates that the companies deliberately engaged in criminal behavior, causing me harm and financial losses by way of their monopolizing actions.

41) Therefore, I request an organized approach to seek justice for their crimes. The responsible parties must be held accountable for their criminal behavior, and appropriate legal action must be taken against them.

42) Based on the evidence presented in Exhibit C, it is my assertion that Creditors Bureau Associates, and Equifax have flagrantly violated my legal rights under the Racketeer Influenced and Corrupt Organizations Act (RICO Act), Title 18 U.S.C. 1962 Prohibited Activities through their racketeering activities simultaneously on 05/01/2022. Equifax and Creditors Bureau Associates simultaneously committed the violations on

06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. The actions taken by these entities have caused significant harm and damages, including torture and defamation, and constitute clear violations of the RICO Act.

- 43) It is important to note that the RICO Act provides for both criminal and civil penalties for individuals and organizations engaged in racketeering activities, and it is essential that we hold these parties accountable for their actions. As such, I demand that the responsible parties be held accountable for their violations and that I will be duly compensated for the damages incurred as a result of their misconduct.
- 44) Three significant cases that found credit bureaus in violation of the RICO Act include *Cortez v. TransUnion L.L.C.*, which awarded \$750,000 to Sandra Cortez for false reporting; *Miller v. Equifax Information Services L.L.C.*, which awarded \$18.6 million to Julie Miller for failing to correct inaccuracies; and *Royce v. Hahn, Loeser & Parks L.L.P.*, which awarded \$1.26 million to Michael Royce for fraudulent judgments.
- 45) Creditors Bureau Associates, on the other hand, has committed 13 counts of this violation, resulting in damages equivalent to threefold of total damages caused by the violation. These counts are based on evidential proof as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23, as demonstrated in Exhibit C.

46) Similarly, Equifax has committed 13 counts of this violation, resulting in damages equivalent to threefold of the total damages caused by the violation. These counts are based on evidential proof as of 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23, as demonstrated in Exhibit C.

47) My rights were violated based on the grounds of torture, as defined under Title 18 U.S.C. 2340 and relevant state laws, by Creditors Bureau Associates, and Equifax on 05/01/2022. The evidence presented in Exhibit C shows clear instances of racketeering activities taken to inflict harm and defamation upon me, resulting in significant damages. It is imperative that the responsible parties be held accountable for their actions under the applicable federal and state laws.

Defamation

48) Based on the evidential proof presented in Exhibit C, there are multiple counts of defamation committed by Creditors Bureau Associates, Equifax, and Experian as of 05/01/2022. These actions violate the protections

provided by the First Amendment to the U.S. Constitution, Article 1, Section 7, which protects individuals from defamation and provides a cause of action for those who have been defamed. Georgia Code § 51-5-1 also provides a cause of action for defamation in Georgia, including both libel and slander. Previous court cases, such as Equifax Credit Information Services, Inc. v. Weeks (1996), Noriega v. TransUnion L.L.C., and Choke v. Equifax, have upheld these laws and awarded damages to individuals who have been defamed by credit reporting agencies.

49) I assert that Equifax committed 143 counts per violation, specifically, 13 counts on 05/01/2022, 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23. Creditors Bureau Associates committed 88 counts per violation respectively 22 counts on 05/01/2022 and 13 counts on 06/01/22, 08/01/22, 10/01/22, 11/01/22, 12/01/22, and 01/01/23,. Experian also committed 13 counts per violation on 05/01/2022. Such conspicuousness of fraudulent activities indicates that the companies deliberately engaged in criminal behavior, causing me harm and financial losses through their monopolizing actions.

I hereby affirm the information above is true, accurate, and complete to the best of my knowledge and that no relevant information has been omitted.

Date:

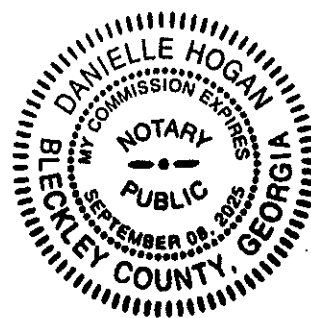
05/11/23

Signature of Individual

[Signature]

Notary Public

Title and Rank



[Signature]

Date of Commission Expiry

9/8/2025